

REMARKS

By this amendment, Claims 56-58 and 60-62 have been amended. No claims have been added or cancelled. Hence, Claims 56-63 are pending in the application.

One of the amendments to Claims 56, 57, 60, and 61 is made to clarify that the mobile interactions server of the mobile applications server acts as the intermediary between applications and mobile devices. Another amendment to Claims 56 and 60 is to provide context to the claims in that a single server acts as an intermediary between multiple mobile devices and multiple applications, not just a single application. Another amendment to Claims 56 and 60 is to clarify that the mobile devices reside on machines that are separate from any of application of the multiple applications.

SUMMARY OF THE REJECTIONS

Claims 56-63 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated over U.S. Patent No. 6,300,947 issued to Kanevsky et al. ("*Kanevsky*").

Claims 56-63 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated over U.S. Patent No. 6,839,744 issued to Kloba et al. ("*Kloba*").

Applicants respectfully traverse.

AN IDS HAS BEEN FILED WITHOUT ACKNOWLEDGEMENT

Applicants respectfully note that they have not received an initialed 1449 form acknowledging the receipt and consideration of Information Disclosure Statements (the "unacknowledged IDSs") filed on September 2, 2005 and on September 16, 2005. Applicants respectfully request a copy of an initialed 1449 form to acknowledge the receipt and

consideration of the unacknowledged IDSs. For the convenience of the Examiner, the unacknowledged IDSs accompany the present reply.

EACH OF THE PENDING CLAIMS IS PATENTABLE OVER THE CITED ART

Each of Claims 56-63 features one or more elements that are not disclosed, taught, or suggested by the cited art. For example, amended Claim 56 recites:

“receiving, at a mobile interactions server, first registration data from a first application of a plurality of applications, **wherein the first registration data specifies rules about how mobile devices are allowed to interact with the first application;** receiving, at the mobile interactions server, second registration data from a second application of the plurality of applications, **wherein the second registration data specifies rules about how mobile devices are allowed to interact with the second application;** **wherein said first application is distinct from said second application;** **wherein the plurality of applications each do not execute on any of said mobile devices;** the mobile interactions server operating as an intermediary for interactions between mobile devices and each of the plurality of applications; and while operating as an intermediary, the mobile interactions server enforcing the rules about how mobile devices are allowed to interact with each of the plurality of applications, wherein each of the plurality of applications is relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with said each of the plurality of applications” (emphasis added)

At least the above-bolded elements are not disclosed, taught, or suggested by at least one of *Kanevsky* or *Kloba*.

The approach of Claim 56 provides a framework for mobile devices to request and receive services from multiple applications. A first application sends first registration data, which specifies rules about how mobile devices are allowed to interact with the first application, to a mobile interactions server. A second application also sends second registration data, which specifies rules about how mobile devices are allowed to interact with the second application, to the mobile interactions server. **Advantageously, neither the first application nor the second application is required to be configured with knowledge of the capabilities**

of any mobile device, or how to communicate with any mobile device, because the mobile interactions server operates as an intermediary for interactions between the mobile devices and the first and second applications. While operating as an intermediary, the mobile interactions server enforces the rules about how mobile devices are allowed to interact with the first and second applications. Thus, the applications are relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with the applications.

A. KANEVSKY

1. The teachings of Kanevsky

Kanevsky teaches an approach for adapting the display of a web page, at a client, based on the presentation capabilities of the client. According to the approach of *Kanevsky*, a client sends a request message that requests a web page identified by a URL to a server machine (Col. 6, lines 4-20). Simultaneously with the request message, the client sends a display mode message, which identifies several characteristics or parameters of the client's display, to the server machine (Col. 6, lines 21-28). A web page server adapter 107 transforms the requested web page to adapt the requested web page with the characteristics of the client's display identified in the display mode message (Col. 7, lines 24-40). The transformed requested web page is thereafter sent to the server 104, which sends the transformed requested web page onto the client machine 100 (Col. 7, lines 42-45). *Kanevsky* is not concerned with relieving applications of the responsibility of enforcing rules about how mobile devices are allowed to interact with the applications. Rather, *Kanevsky* is concerned with adapting web content according to the display of a particular client machine.

2. Kanevsky fails to disclose “wherein the plurality of applications each do not execute on any of said mobile devices”

Claim 56 features the element of “the plurality of applications each do not execute on any of said mobile devices.” The Office Action appears to equate (1) the mobile interactions server as claimed with the server 104 of *Kavensky*, (2) the first application as claimed with the web browser 101 of *Kavensky*, and (3) the mobile devices as claimed with the display 113 of the client machine 100 of *Kavensky*. However, the web browser 101 executes on the client machine 100 and the display 113 is part of the client machine 100. Indeed, *Kavensky* states, “client machine...includes a display 113” (Col. 4, lines 64-67). Unlike a mobile device as claimed is not part of the machine upon which an application as claimed executes, the display 113 of *Kavensky* is part of the client machine 100 upon which the web browser 101 executes. Thus, *Kavensky* fails to teach or suggest (and in fact teaches away from) this feature of Claim 56. It is therefore respectfully submitted that Claim 56 is not anticipated by *Kavensky*.

3. Kavensky fails to disclose “the mobile interactions server enforcing the rules about how mobile devices are allowed to interact with each of the plurality of applications”

Claim 56 also recites “while operating as an intermediary, the mobile interactions server enforcing the rules about how mobile devices are allowed to interact with the application, wherein the application is relieved of the responsibility of enforcing the rules about how mobile devices are allowed to interact with the application.” The Office Action identifies Col. 7, lines 10-40 in *Kavensky* to show this element. However, this portion of *Kavensky* merely discusses the process of sending a request message for a web page and the web page being transformed before it is sent to the initial requester.

The Office Action, as previously mentioned, relies upon server 104 to show a mobile interactions server. Thus, to satisfy the features of Claim 56, the position of the Office Action requires that server 104 “enforce the rules about how mobile devices are allowed to interact with the first application” where the rules are specified in registration data sent by an application. In sharp contrast, *Kanevsky* **lacks any teaching or suggestion that server 104 enforces any rules**, much less rules about how a mobile device is allowed to interact with an application. Instead, the **server 104 merely acts as a recipient and forwarder** of requests and a recipient and forwarder of responses.

To illustrate, instead of showing the claimed features of the mobile interactions server, *Kanevsky* teaches that server 104 is operatively coupled to web sites 105 and 106 and a web page adaptor 107 (col. 5, lines 1-3). Server 104 receives a request message 102, from a client machine 100, and directs the request message 102 to the appropriate web server (col. 7, lines 10-12) to retrieve a web page. The web page (e.g. from web site 106) is sent to server 104 and forwarded to web page adaptor 107 to be transformed according to a display mode message 103 (also sent from client machine 100) (col. 7, lines 16-19). The transformed web page from the web server adaptor 107 is sent to server 104 and forward to client machine 100 (col. 7, lines 42-44). However, the above activity performed by server 104 is not analogous to enforcing any rules, let alone enforcing rules about how a mobile device is allowed to interact with an application. If the Office disagrees, the Office is respectfully requested to particularly identify the set of rules server 104 is enforcing about how mobile devices are allowed to interact with the application.

Consequently, the element of “while operating as an intermediary, the mobile interactions server enforcing the rules about how mobile devices are allowed to interact with the application, wherein the application is relieved of the responsibility of enforcing the rules

about how mobile devices are allowed to interact with the application” cannot be disclosed, taught, or suggested by *Kanevsky*.

As at least one element recited in Claim 56 is not disclosed, taught, or suggested by *Kanevsky*, it is respectfully submitted that Claim 56 recites at least one element that is not disclosed, taught, or suggested by the cited art. Consequently, it is respectfully submitted that Claim 56 is patentable over *Kanevsky* and is in condition for allowance.

Claim 60 recites elements similar to that of Claim 56, except that Claim 60 is recited in machine-readable medium format. Consequently, for at least the reasons given above with respect to Claim 56, it is respectfully submitted that Claim 60 is patentable over the cited art and is in condition for allowance.

Claims 57-59 and 61-63 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 57-59 and 61-63 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 57-59 and 61-63 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

B. *KLOBA*

1. Teachings of Kloba

Kloba teaches an approach for enabling web content to be loaded on mobile devices and for users of mobile devices to operate with such web content in an interactive manner while in an off-line mode (Abstract and Summary). Thus, because *Kloba* is primarily concerned with

allowing a mobile device to interact with web content while in off-line mode, *Kloba* does not disclose a mechanism whereby a mobile interactions server relieves applications of the responsibility to enforce rules about how mobile devices are allowed to interact with any of the applications.

2. *Kloba fails to disclose “receiving...first registration data from a first application”*

Claim 56 features the element of “receiving, at a mobile interactions server, first registration data from a first application, wherein the first registration data specifies rules about how mobile devices are allowed to interact with the first application.” The Office Action cites (a) Col. 29, lines 6-9, which briefly discusses a client registration process, (b) Col. 23, lines 1-44, which states that state information pertaining to a client 108 is cached on a server 104, and (c) Col. 6, lines 3-36, which states that a server contains logic for optimizing content by considering many factors of the client, such as memory, synchronization properties, and screen size. The Office Action appears to equate (1) the mobile interactions server of Claim 56 with the server 104 of *Kloba*, (2) the mobile devices of Claim 56 with the devices 106 of *Kloba*, and (3) the first application of Claim 56 with the provider 128 of *Kloba*. Thus, in order to teach or suggest the above feature, the first registration data must be received from the provider 128.

However, Col. 29, lines 6-9, merely states, *in toto*, “In one embodiment, the invention includes a client registration process that includes GUI elements for the capture and configuration of client details and preferences.” The subsequent portion of *Kloba* states that a client is registered with the server 104. ***Kloba fails to teach or suggest anywhere that the registration data, as claimed, is received from the provider 128.*** The provider 128 provides content, applications, and services (Col. 12, lines 31-34), but the provider 128 does not provide

registration data that specifies rule about how mobile devices are allowed to interact with the provider 128.

3. *Kloba fails to disclose “receiving...second registration data from a second application”*

Consequently, because *Kloba* fails to teach or suggest that registration data as claimed is received from the provider 128, *Kloba* also fails to disclose “receiving, at the mobile interactions server, second registration data”, much less that the second registration is “from a **second application** of the plurality of applications”, as recited by Claim 56.

4. *Kloba fails to disclose or suggest any pending claims*

In view of the above fundamental differences between the features of Claim 56 and *Kloba*, it is respectfully submitted that Claim 56 recites at least one element that is not disclosed, taught, or suggested by the cited art. Consequently, it is respectfully submitted that Claim 56 is patentable over *Kloba* and is in condition for allowance.

Claim 60 recites elements similar to that of Claim 56, except that Claim 60 is recited in machine-readable medium format. Consequently, for at least the reasons given above with respect to Claim 56, it is respectfully submitted that Claim 60 is patentable over *Kloba* and is in condition for allowance.

Claims 57-59 and 61-63 are dependent claims, each of which depends (directly or indirectly) on one of the claims discussed above. Each of Claims 57-59 and 61-63 is therefore allowable for the reasons given above for the claim on which it depends. In addition, each of Claims 57-59 and 61-63 introduces one or more additional limitations that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not

included at this time, although the Applicants reserve the right to further point out the differences between the cited art and the novel features recited in the dependent claims.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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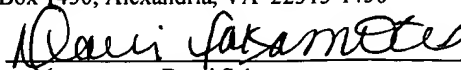
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on August 17, 2006

by



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